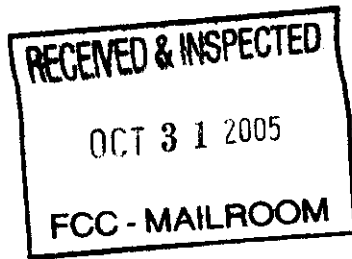


**PEMBROKE**  
**TELEPHONE COOPERATIVE**



Ms. Marlene Dortch  
Federal Communications Commission  
Office of the Secretary  
445 - 12<sup>th</sup> Street, SW  
Room TW-A325  
Washington, DC 20554

**DOCKET FILE COPY ORIGINAL**

RE: CC Docket No. 96-45

Company Name: Pembroke Telephone Cooperative  
P.O. Box 549  
Pembroke, VA 24136

Study Area Code: 190243

Contact Name: Lisa W. Epperley  
General Manager

Telephone No.: 540-626-7111

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E-mail Address: [lisaeppeley@pemtrel.net](mailto:lisaeppeley@pemtrel.net)

Cc: Karen Majcher, Vice President of the High Cost and Low Income Division  
(USAC)

Michael Spead, Universal Service Administrative Company

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**PEMBROKE**  
**TELEPHONE COOPERATIVE**

October 25, 2005

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FCC - MAILROOM

Federal Communications Commission  
Office of the Secretary  
445 – 12<sup>th</sup> Street, SW  
Room TW-A325  
Washington, DC 20554

To Whom It May Concern:

I am filing this letter to petition for a waiver with the Federal Communications Commission (FCC) for Pembroke Telephone Cooperative's Rural Use Certification due September 30, 2005 for the period October through December 2005.

Jill Williams, our office manager, received a telephone call from our NECA representative on October 10, 2005 stating that our Annual Certification was not posted on the Universal Service Administration's (USAC) website checklist. She called the USAC office and was told that she needed to contact the Washington office. She was given John Alco's name and telephone number. She called on October 10 and again on October 12 but did not get a returned call. On October 14<sup>th</sup>, I called USAC and expressed my concerns to Mr. John Alco regarding this situation. Please accept the following statement from Mrs. Williams on the details of her handling the filing.

I am Jill Williams, the one responsible for the filing at this time and would like to offer my actions. I received a reminder from NECA dated August 23, 2005 giving notice of a Quarterly Line Count Data Collection and Rural Use Certification that must be filed with USAC and the FCC no later than October 1, 2005. It recommended that it be sent with a signed receipt to help avoid potential interruptions in high cost support payments. I completed our certification and contacted our Cooperative's president to come by the office to sign this certification. He came by and signed it on September 28, 2005 and I then took the executed certification to the postal service and got a certified mail, return receipt as instructed for proof of mailing on September 29, 2005. I filed this in accordance to tax reports that I file which requires the postmark as the filing date and felt this report was submitted as required. The certified mailings were signed delivered to USAC on October 3, 2005 and to the FCC on October 4, 2005. Being assured at that point with the confirmation, I felt that our certification had been confirmed. However, I have been suddenly educated that the timing was not as required. I have been informed that the certification needed to be in USAC's and the FCC's office on September 30, 2005. The sad part is that had I known this, I could have sent the filing with overnight delivery

PEMBROKE TELEPHONE COOPERATIVE

October 25, 2005

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and the filing would have been received in accordance with what I have learned. Pembroke Telephone Cooperative is very dependent on these funds. Pembroke needs these funds to continue its mission statement to its customers/members to be the provider of choice for affordable, quality communication services. Currently, we are completing many upgrades to our system provisioning our service area of less than 3,000 access lines with quality service. Loan arrangements have been acquired through USDA/Rural Utilities Service and these funds are very critical in its provisioning for facilities.

Being a newcomer in submitting this certification and knowing how important these funds are to our cooperative in meeting financial obligations and also providing our customers with the service they have come to appreciate in a rural area, I am asking for a waiver for the Rural Use Certification not being received by September 30, 2005. I apologize for this and would appreciate your kind consideration. I am now very aware of the time limit and will make a good faith effort to comply to future filings. Again, thank you for your help in this matter.

As general manager for Pembroke Telephone Cooperative, I ask that you please consider this letter to petition for a waiver. Thank you for your consideration.

Respectfully submitted,

  
Lisa W. Epperley  
General Manager